

REMARKS

Claim Objections

Applicant has amended claim 51, as per the Office Action suggestion at paragraph 2.

Applicant respectfully requests withdrawal of the objection.

Claims 40-56 are Allowable

The Office has rejected claims 40-56, at paragraphs 3-3.17 of the Office Action, under 35 U.S.C. §103(a), as being unpatentable over U.S. Patent No. 6,925,155 ("Reynolds") in view of U.S. Patent No. 6,038,293 ("McNerney"), and further in view of U.S. Patent No. 6,598,021 ("Shambaugh"). Applicant respectfully traverses the rejections.

None of the cited references, including Reynolds, McNerney, and Shambaugh, disclose or suggest the specific combination of claim 40. For example, the Office Action admits that Reynolds does not disclose that the call routing module, in response to determining via decoding of a message from an IVR that a live agent is required, is to route an incoming call to a computer telephony interface, as recited in claim 40. *See* Office Action, paragraph 3.1. Further, McNerney does not disclose this element of claim 40. In contrast to claim 40, McNerney discloses that an IVR unit receiving a call from a caller may determine that the caller needs to be serviced by a particular call center, and will transfer the call to that call center. *See* McNerney, col. 1, lines 32-34. Further, Shambaugh does not disclose this element of claim 40. Instead, Shambaugh discloses that switched circuit calls may be received and routed to agent stations or interactive voice response units by a transaction processing system that may route the call based on the identity of the customer. *See* Shambaugh, col. 3, lines 10-15, and col. 3, line 67-col. 4, line 8. Therefore, Reynolds, McNerney, and Shambaugh, separately or in combination, fail to disclose each and every element of claim 40. Hence, claim 40 is allowable.

Claims 41-56 depend from claim 40, which Applicant has shown to be allowable. Hence, Reynolds, McNerney, and Shambaugh fail to disclose at least one element of each of claims 41-56. Accordingly, claims 41-56 are also allowable, at least by virtue of their dependence from claim 40.

Further, the dependent claims recite additional elements that are not disclosed by the cited references. For example, Reynolds does not disclose a customer relationship management (CRM) system that is adapted to route an incoming call to a live agent using a whisper transfer, as recited in claim 43. Reynolds does not disclose use of a "whisper transfer" to an agent. Instead, Reynolds discloses that a service control point (SCP) 140 can be used to provide routing information to a terminating switch 120 in response to information received from a Line Information Database (LIDB), such as language preferences. *See* Reynolds, col. 4, lines 22-30. Further, neither McNerney nor Shambaugh disclose this element of claim 43. For this additional reason, claim 43 is allowable.

Further, Reynolds does not disclose a Customer Relations Management (CRM) system that plays a group message based on a message from a first interactive voice response (IVR) module provided by a call routing module, as recited in claim 44. Instead, Reynolds discloses that if no language preference is associated with a calling telephone number, the call can be routed to an IVR that implements a default language and enables the IVR to facilitate a user's selection of a preferred language. *See* Reynolds, col. 9, lines 18-25. Further, neither McNerney nor Shambaugh disclose this element of claim 44. For this additional reason, claim 44 is allowable.

Further, Reynolds does not disclose a data module adapted to determine if a dialed number identification service (DNIS) identifier associated with the incoming call is defined, and when the DNIS is not defined, to play a pre-defined announcement before terminating the incoming call or to refrain from answering the incoming call, as recited in claim 46. Instead, Reynolds discloses that if no language preference is associated with the calling telephone number, the call can be routed to an IVR that implements a default language, such as English, and enables a user to select a preferred language. *See* Reynolds, col. 9, lines 17-29. Further, neither McNerney nor Shambaugh disclose this element of claim 46. For this additional reason, claim 46 is allowable.

Further, McNerney does not disclose a computer telephony interface (CTI) responsive to an IVR module, the CTI adapted to launch a screen display at the call center agent terminal that is a screen pop including session specific information collected from the incoming call and information gathered from a customer relationship manager (CRM) database, as recited in claim 56. In contrast to claim 56, McNerney does not disclose a screen pop including session specific information collected from an incoming call and information gathered from a CRM database. Instead, McNerney discloses an automatic call distributor (ACD) with a computer/telephony interface that enables the ACD to transmit and receive data from an agent work station, and a call recognition service (CRS) that can transfer data to and from the call centers. *See McNerney*, col. 3, lines 35-45. Further, Reynolds does not disclose this element of claim 56. Shambaugh, in contrast to claim 56, discloses that a CPU selects an agent and delivers a call to a console of the selected agent and the CPU may also send a call delivery message including the call associated information to the host, which may present customer records to a selected agent as a screen pop, but Shambaugh does not disclose a CTI responsive to an IVR module, or that the screen pop includes session specific information collected from the incoming call. *See Shambaugh*, col. 4, lines 10-25. For this additional reason, claim 56 is allowable.

Claim 60 is Allowable

New claim 60 depends from claim 40. Applicant has shown that claim 40 is allowable. Therefore claim 60 is allowable, at least by virtue of its dependence from claim 40.

CONCLUSION

Applicant has pointed out specific features of the claims not disclosed, suggested, or rendered obvious by the references applied in the Office Action. Accordingly, Applicant respectfully requests reconsideration and withdrawal of each of the objections and rejections, as well as an indication of the allowability of each of the pending claims.

Any changes to the claims in this amendment, which have not been specifically noted to overcome a rejection based upon the prior art, should be considered to have been made for a purpose unrelated to patentability, and no estoppel should be deemed to attach thereto.


Attorney Docket No.: 1033-T00537

The Examiner is invited to contact the undersigned attorney at the telephone number listed below if such a call would in any way facilitate allowance of this application.

The Commissioner is hereby authorized to charge any fees, which may be required, or credit any overpayment, to Deposit Account Number 50-2469.

Respectfully submitted,

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Date


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